UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875** **HON. ROBERT B. KUGLER**
THIS DOCUMENT RELATES TO ALL CASES	

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Jessica Davidson Miller**
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111
Attorneys for Defendants

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of Ali Afnan, Ph.D., on February 8, 2023, at 9:00 a.m. eastern time, and continuing until completion, at Skadden, Arps, Slate, Meagher & Flom LLP, 1440 New York Avenue, N.W., Washington, D.C. 20005-2111, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least 48 hours in advance of the deposition.

TAKING ATTORNEY FOR PLAINTIFFS:

ADAM M. SLATER, ESQ.
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The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 1, 2023

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/Adam M. Slater
ADAM M. SLATER
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Roseland, NJ 07068
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EXHIBIT A

DOCUMENT REQUESTS

1) Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Dr. Afnan's report, and preparation for deposition or trial.

2) Copies of any documentation reflecting or created in connection with any work performed by Dr. Afnan for or on behalf of any defendant in this litigation, whether or not in connection with the litigation.

3) Copies of any notes, i.e. written or electronic, reflecting consulting or litigation work on behalf of any defendant or their counsel, with regard to any issues in this MDL, that has not been documented in invoices.

4) Copies of any notes or other documentation, including PowerPoints, for any presentations, seminars, or classes, given by Dr. Afnan with regard to cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, the chemical formation of nitrosamines under any circumstances, including those formed in ZHP's manufacturing process for valsartan API.

5) Copies of any notes or other documentation, including PowerPoints, for any presentations, seminars, or classes, given by Dr. Afnan with regard to cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, the technology and methods used for the identification of nitrosamines under any circumstances, including those formed in ZHP's manufacturing process for valsartan API.

6) Copies of any documents or articles relied upon for the opinions set forth in the report served.

7) Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.

8) Copies of any documents, recordings, or videos, considered or relied on in connection with the report served in this litigation, whether or not listed in the report or attachments thereto.

9) Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Dr. Afnan in connection with a Daubert hearing or trial testimony in this litigation.

10) Documentation of any research grant the witness has been provided to study any cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, angiotensin II receptor blockers, nitrosamines, or the identification of nitrosamines.

11) Documentation of any research the witness has performed with regard to cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, any angiotensin II receptor blockers, nitrosamines, or the identification of nitrosamines.

12) Copies of any documents including protocols or information about cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, the chemical formation of nitrosamines under any circumstances, available to the witness from any company, facility, or academic institution where he has worked, had an appointment, or had access, which set forth information related to cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, the chemical formation of nitrosamines under any circumstances, and the technology and methods used to identify nitrosamines.

13) Any documents or other communications the witness has received from any person or entity with regard to cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of information provided by counsel who retained the witness.

14) Any communications from the witness to any person or entity with regard to cGMP and regulatory obligations of API and finished dose manufacturers in the pharmaceutical industry, nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of communications to counsel who retained the witness.

15) Any literature or textbook referenced by the witness in forming his or her opinions.

16) Dr. Afnan's current CV.

17) Any cGMP guidance, rule, protocol, or procedure, drafted in whole or in part by Dr. Afnan, related to the development or manufacture of API or finished dose, and or with regard to genotoxic or other impurities, in API or finished dose.

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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2023, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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